



Mechanical Contractors Association of Connecticut, Inc.

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BUREAU OF WATER PROTECTION AND LAND REUSE  
OFFICE OF THE BUREAU CHIEF

January 21, 2010

Paul Stacey  
Hearing Office  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106

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Re: Proposed Stream Flow Regulations

Dear Mr. Stacey:

The Mechanical Contractors of Connecticut urge rejection of the proposed stream flow regulations which will negatively affect the state's construction industry by imposing unfair, burdensome regulations which will limit the amount of water available to meet the needs of residents and businesses.

Although the proposed regulations are aimed at protecting the state's fish and other aquatic life, they do so to the detriment of people and businesses. The regulations are clearly not balanced in a way that will ensure that the public health, safety, and economic development needs of the state are addressed. It is our understanding that many towns and cities across Connecticut will not have sufficient water supplies to support construction and economic development projects, which are needed to create jobs. Some areas are also concerned that they will not have sufficient supplies to meet the existing needs of their customers because they will face strict limitations on groundwater withdrawals as well as reservoir release requirements to put more water into the streams. While this is certainly a worthy goal, it must be done in a way that does not undermine Connecticut's economic competitiveness.

Given all of the state's serious problems, including a growing budget deficit, it is surprising that a state agency is pushing for adoption of regulations that will require significant state resources to implement and result in declining tax revenues due to construction moratoriums. It is also troubling that the fiscal note attached to the regulations fails to reflect these costs accurately.

We urge policymakers to reject the proposed regulations and, instead, focus on ways of nurturing economic growth. Connecticut has lost an estimated 110,000 jobs in this recession. Many of these jobs have been high-paying jobs in the construction industry which have a strong multiplier effect on our economy. We must develop balanced policies that recognize the need to support continued economic growth and reject regulations that unnecessarily thwart this growth.

For these reasons, we urge rejection of the proposed stream flow regulations.

Very truly yours,

John A. Barrasso  
Executive Vice President